

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In re Flint Water Cases*

No. 5:16-cv-10444  
Honorable Judith E. Levy

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**CO-LIAISON COUNSEL FOR INDIVIDUAL PLAINTIFFS' MOTION TO  
AMEND THE FOURTH AMENDED CASE MANAGEMENT ORDER**

Pursuant to Federal Rule of Civil Procedure 16(b)(4), and for the reasons set forth below, Co-Liaison Counsel for the Individual Plaintiffs respectfully move the Court to amend the Fourth Amended Case Management Order (Doc. No. 1162) by extending all remaining dates for the First Bellwether Group—including dates for discovery, dispositive motions, and trial—by three days.<sup>1</sup>

On July 2, 2020, the Court entered an order extending all remaining dates for the First Bellwether Group by one month. *See* Docket Text Order Granting Dkt. 1180, Motion to Amend Case Management Order No. 4. Since then, the Individual Plaintiffs have strove to comply with the Order's time periods. However, due to complications arising from Tropical Storm Isaias, including the loss of power at Counsel's home, Plaintiffs are respectfully requesting an additional three days to submit Plaintiffs' expert reports.

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<sup>1</sup> *See* Table of Current and Proposed First Bellwether Group Dates, annexed hereto as **Exhibit A**.

The Individual Plaintiffs, after conferring and with the consent of Defendants, believe a three-day extension will not impose an undue delay in light of the circumstances, but will help the Individual Plaintiffs (and other parties) continue to complete discovery. Furthermore, since all dates would be uniformly extended by three days, the extension will not prejudice any other parties. In sum, there is good cause to grant the motion, and it would a provident exercise of discretion to do so.

Accordingly, Co-Liaison Counsel for Individual Plaintiffs respectfully request the Court to amend the Fourth Amended Case Management Order by extending all dates pertaining to bellwether trial process—including dates for discovery, dispositive motions, and trial—by three days.

Dated: August 7, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Patrick J. Lanciotti, hereby certify that on August 7, 2020, the foregoing Co-Liaison Counsel for Individual Plaintiffs' Motion to Amend the Fourth Amended Case Management Order, including the Exhibit A annexed thereto, was served electronically (via ECF) to all counsel of record.

/s/ Patrick J. Lanciotti  
Patrick J. Lanciotti